

## Friends of Army Aviation

## Experience the Rich Heritage of Army Aviation

189 Heritage Way, Ozark AL 36360 334-445-0008 501 (C)(3) Public Education Foundation

June 25, 2021

US DOT, Docket Operations West Building, Ground Floor, Room W12-140 1200 New Jersey Avenue, SE Washington, DC 20596

Subject: Extension of Living History Flight Experience (LHFE), Exemption No. 17611A Regulatory Docket No FAA-2017-0823

- 1. The purpose of this letter is to request an extension of LHFE Exemption No 17611A which will expire on October 31, 2021.
- 2. Friends of Army Aviation-Ozark FAA-O is a 501(c)(3) non-profit tax-exempt educational organization and is dedicated to the preservation of Army Aviation. FAA-O allows the American public the opportunity to experience flight in a legacy UH-1H model helicopter. Since 2017 FAA-O has operated our UH-1H Huey Helicopter, N75140, for the purpose of carrying passengers for hire on local and extended area flights under the terms and conditions of Exemption No. 17611A. Since the last extension of our exemption in October 2019, despite the COVID-19 Pandemic, FAA-O has flown 20 LHFE ride events while carrying 5,030 passengers. As a point of interest, since receiving our exemption in August of 2017 to current date, FAA-O has flown 45 LHFE ride events carrying a total of 11,332 paying passengers.
- 3. FAA-O is requesting a change to exemption No. 17611A dated September 6, 2019, to Condition and Limitations paragraph 13. a. which reads:
  - a. 13. All flight operations must be conducted---
- a. At a minimum operating altitude of not less than 1,000 feet above ground level (AGL);

- b. FAA-O is requesting the minimum operating altitude be changed to state; "At a minimum operating altitude of not less than 500 feet AGL.
- c. Include in Condition and Limitations number 13. a., language to allow helicopter LHFE operations as authorized in Title 14 of the Code of Federal Regulations, Section 91.119 (d) of the General Operating and Flight Rules (Minimum safe altitudes).
- d. Helicopter LHFE flights do not take off and fly away from the departure point on a route and return sometime later. Points of discussion:
  - (1) The helicopter LHFE operations remain close to the point of departure.
- (2) There are circumstances beyond FAA-O control that it is necessary to return to the point of departure prior to reaching 1000 feet AGL due to air traffic deconfliction.
- (3) FAA-O LHFE flights normally last 10 minutes or less. The extra time that it takes to climb and descend from 1,000 feet AGL cuts into the time that we can use to safely demonstrate the flight characteristics of the UH-1H.
- e. FAA-O request an amendment to our exemption No. 17611A dated September 6, 2019, to change Condition and Limitations paragraph 13. a. to read:
  - 13. All flight operations must be conducted---

## a. At a minimum operating altitude of not less than 500 feet above ground level (AGL).

- f. It should be noted that there are already two precedence in which holders of LHFE Exemptions have been granted approval to operate at 500 feet AGL for helicopter operations. One is the Cavanaugh Flight Museum, Exemption No. 9902, and the Army Aviation Heritage Foundation, Exemption No. 10012F. Both organizations have been granted approval to operate helicopter operations at 500 feet AGL.
- g. There has been no change in the conditions and reasons to Public Interest and Safety which were the basis for issuance of the original exemption. This change can be accomplished safely and will allow for FOAA to provide a better ride experience for our customers.
- 4. FAA-O is requesting that UH-1H Huey Helicopter N467WW, Serial Number 70-16467, be added to the extension of Exemption No. 17611A. N467WW approved Aircraft Inspection Plan is attached to this extension request. As of the date of this letter FAA-O has not received a Special Airworthiness Certificate for N467WW. It is anticipated the Special Airworthiness Certificate for N467WW will be issued within the next 45 days. The Certificate, along with the Conditions and Limitations, will be forwarded as soon as the documents are available. UH-1H Huey Helicopter N467WW, Serial Number 70-16467 is configured in the same way as UH-1H Huey Helicopter N75140, Serial Number 71-20123. FAA-O request our extension not be held

up in the event the Special Airworthiness Certificate and Conditions and Limitations for N467WW are not published in a timely manner.

- 5. FAA-O makes this request specifically for the purpose of providing the public and our Veterans, who must not be forgotten, a memorable experience in the UH-1H for educational and historical purposes. Accordingly, we respectively request the Exemption be renewed, along with requested changes, as it continues to be in the interest of the public. The FAA-O Manuals are available upon request.
- 5. Point of contact for this extension is Jack Holmes, FAA-O Chief Pilot. Mr. Holmes can be reached at <u>jaholmes1948@icloud.com</u> or 334.709.0929 should you have any questions or require additional information.

Sincerely,

LTC (Ret) John "Doc" Holladay

President

Friends of Army Aviation-Ozark

j holladay@comcast.net

334.701.9337

www.friendsofarmy aviation.org